

Immunization Program Revision and Update of Chapter 246-100 WAC

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases

State Board of Health Hearing – March 9, 2005

Revision Recommendations and Status

WAC 246-100-166 Recommendations	WAC 246-100-166 Revision Issues Identified	WAC 246-100-166 Revision Status
1. Make WAC organization and language generally more readable to reduce confusion	The general organization of the WAC could provide enhanced readability and reduce confusion.	<p>The rule has been reorganized into the following major sections:</p> <ol style="list-style-type: none"> 1) A new Section 1 to define the purpose of the rule 2) Definitions—new definitions have been added to provide clarity. Most importantly, characterizing conditional status, exemptions, and full immunization as types of immunization status. 3) Required documentation by schools and childcare centers. 4) Duties and schools and childcare related to enforcing immunization requirements. 5) Duties of persons administering immunizations 6) Rules relating to when a school could exclude a child. 7) Clarification as to when a local health officer may exclude a child under this rule.
2. Remove CIS data requirements	Remove requirements for specific data elements on the CIS form. Currently, the name of child or student; birth date; gender; type of vaccine; date of dose of vaccine received specifying day, month, and year; signature of parent, legal guardian, or adult in loco; and documented exemptions are required. Not listing specific requirements allow changes in requirements without rule revision.	<p>Clarified the definition of CIS in Section 2 as:</p> <ol style="list-style-type: none"> 1) a certificate of immunization status form approved by the department, 2) a CHILD Profile immunization record, or 3) any other immunization form approved by the department.

		<p>Comprehensive list of data elements removed from the definitions section and instead are listed under Section 3 to clarify that schools and child care centers are to require specific pieces of information.</p> <p>Removed requirement for gender element.</p>
3. Electronic CIS filing	The issue of accommodating electronic filing was explored. The issue of allowing for electronic and printed filing of certificate of immunization identified and new language considered.	Revising the rule to allow for electronic filing was not pursued, since parental signature is required on the form. Electronic filing could not accommodate a signature.
4. Align reporting dates	Establish one reporting date for schools, preschools, and child care centers. Reporting deadlines to submit the annual report on immunizations to DOH and LHJs differ. As currently written, schools are asked to submit them by November 1 of each year (except in the event of a late school opening) and preschools and daycare centers are asked to submit them by February 1 of each year.	<p>Aligned reporting deadlines in Section 4 to November 1st for schools, preschools, and child care centers.</p> <p>Clarified reporting due date when school opens after October 1. In the event of a late school opening, the report is due thirty days from the first day of school.</p>
5. Eliminate confusion about “schedule”	<p>Clarify language to eliminate confusion about use of the term “schedule”</p> <p>As currently written, “schedule” potentially had several meanings in the current rule, including:</p> <p>A list of diseases for which vaccination is mandatory</p> <p>or</p> <p>The schedule of ages and intervals at which different doses of mandatory vaccines must be administered</p> <p>or</p> <p>The schedule of compliance for children admitted on conditional status</p> <p>or</p> <p>all of the above</p>	<p>The word “schedule” is used in the definition of National Immunization Guidelines under Section 2(j).</p> <p>The definition of full immunization Section 2(g) has been revised to remove the use of the word “schedule” and instead refer to ages and intervals consistent with the National Immunization Guidelines.</p>

6. Reference 2005 ACIP national guidelines for ages and intervals	<p>The rule does not reflect the most current ACIP Recommended Childhood and Adolescent Immunization Schedule.</p> <p>The rule should be updated to reflect the most current ACIP schedule yet clearly state that the SBOH determines what individual antigens are required.</p>	<p>All references to the Recommended Childhood and Adolescent Immunization Schedule: United States changed to reflect July to December 2005 version.</p> <p>The definition of “full immunization” lists specific antigens required by the SBOH in Section 2(g).</p>
7. Remove requirement for secondary documents in Section 6(b)	<p>The necessity of including in rule the requirement of secondary documents.</p> <p>The requirement that the CIS be submitted with supporting documentation is not stipulated elsewhere in WAC 246-100-166 and there is confusion about whether it is necessary. If secondary documents are necessary, the requirement should be included clearly throughout the rule the requirement more clearly defined.</p>	<p>This requirement removed from the WAC altogether as it was determined that supporting documents was not maintained by schools, and an updated CIS form is sufficient.</p>
8. Define local health officer	<p>The term “local health officer” is mentioned in one or more sections of the WAC yet is not defined.</p>	<p>Definition of health officer added to Section 2</p>
9. Clarify definition of childcare	<p>Definition should be more consistent with RCW 74.15.020(a) which defines child day-care center.</p>	<p>Definition adjusted in Section 2 to be more consistent with definition of child day-care center defined in RCW 74.15.020(a).</p>
10. Clarify language around medical exemption	<p>Under the current WAC, medical exemptions are indefinite.</p> <p>The issue is whether the WAC language should be revised to place a time limitation on medical exemptions?</p>	<p>This revision not included as part of this phase of rule revision. Determining whether medical exemptions should be temporary or permanent requires a clarification or change in policy.</p>
11. Remove transfer student exemption	<p>Accuracy of current language regarding exemptions granted to transfer students.</p> <p>According to RCW 28A.210.080, any student changing schools or day care center, even within the same district, must present proof of immunization.</p> <p>The current WAC language can be interpreted to mean that a student may transfer from one school to another within a district without presenting proof of full immunization. Currently, each child is required to present a current CIS when transferring to a new school.</p>	<p>This section has been removed.</p>

Additional SBOH recommendations received after the CR102 filing		
12. Clarify when a child would be excluded from school	Modify Section 7 to clarify when a health officer would exclude someone from school under WAC 246-110	Pending SBOH approval, revise Section 7 to maintain consistency with WAC 246-110
13. School maintaining records on type of exemption	Schools need to keep a record of all exemptions, not just medical exemptions. This information is to be available to LHJs if exclusions become necessary in Sections 4(c)(ii) and 4(d)	Pending SBOH approval, add “religious, philosophical, or personal” to the list of exemptions identified in these sections.

Contact Janna Bardi, Immunization Program Manager, (360) 236-3568 or janna.bardi@doh.wa.gov